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**USDC SDNY
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March 19, 2024

BY ECF

Honorable Margaret M. Garnett
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Toro v. Frame My TV.com, LLC.; Case No 1:23-cv-4863

To the Honorable Judge Garnett,

Plaintiff submits this letter to request an extension of the deadline to submit a pre-motion letter for summary judgment, which is currently March 22, 2024. Defendant has consented to this request. Our office is currently in the process of gathering the necessary facts to submit such a pre-motion letter, and we merely need additional time to do so. As such, Plaintiff requests an extension up to and until April 1, 2024 to file the pre-motion letter for summary judgment. As the post-discovery conference is scheduled for April 9, 2024, this short extension should not affect any future dates in this matter.

We thank Your Honor for the attention and consideration herein.

Respectfully submitted,

/s/ Mars Khaimov
Attorneys for Plaintiff

Cc: all Counsel of record on ECF

Application GRANTED. The parties may submit pre-motion letters for summary judgment by **April 1, 2024**. Should no party file a pre-motion letter for summary judgment, the parties shall file a joint letter by **April 2, 2024**, as directed in the Court's Order dated March 18, 2024 (Dkt. No. 19).

The Clerk of Court is respectfully directed to terminate Dkt. No. 20.

SO ORDERED. Date: 3/21/2024.

HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE

